REMOVAL ACTION WORK PLAN
MATTEO IRON & METAL

Submitted To:

U.S. Environmental Protection Agency, Region 2
2890 Woodbridge Avenue
Edison, NJ 08837-3679

On Behalf Of:

MATTEO IRON & METAL
1692 Crown Point Road
Thorofare, Gloucester County, New Jersey

Prepared By:

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1.0 INTRODUCTION

This Removal Action Plan (Work Plan) has been prepared for the Matteo Iron & Metal (Matteo) Site in Thorofare (West Deptford), New Jersey. An Administrative Settlement Agreement and Order on Consent (AOC) has been entered into by Matteo and USEPA-II for a removal action at this site in accordance with the AOC (CERCLA Docket No. 02-2006-2013). The development, evaluation, and selection of the removal action are described in detail in the Removal Action Plan (RAP). The site history, setting, and current conditions are summarized herein.

1.1 BACKGROUND AND HISTORY

The Matteo Iron & Metal site is an 80.2-acre parcel of land at 1692 Crown Point Road in Thorofare, New Jersey and is listed on the tax maps of Gloucester County as Block 128 and 325 Lot 2. The Matteo family acquired the site in 1947 and the property served as the family home and farm. Subsequently, a scrap metal salvaging operation was initiated at the site and included a junkyard and a metal salvaging facility. Part of the metal salvaging operation included recovering lead cores from automobile batteries. These cores were obtained by cracking open the battery casings and salvaging the lead cores. The liquids and casing material were deposited on the ground and apparently used as backfill in some areas. Much of this activity occurred on the northern portion of the site and the casing remnants are visible at the ground surface, along the waters edge of the banks of Hessian Run, and in portions of the tidal wetlands area along Woodbury Creek.

The site is adjacent to the Willow Woods Mobile Home Trailer Park property and there is unrestricted access between the trailer park site and the Matteo property. There is also evidence of trails through the site and indications that individuals are walking along these trails. Battery casings are also present near the water edge of the active scrap yard and this land is accessible from the remote northern area.

The Matteo site has been the focus of an extensive remedial investigation by the New Jersey Department of Environmental Protection (NJDEP) from September 2000 through October 2002. This investigation included obtaining surface soil samples, sediment samples, and groundwater samples throughout the battery casing area, the present day scrap yard, and the adjoining creek and wetlands areas. This sampling indicated elevated levels of lead in the battery casing area and non-contiguous hot spots in the scrap yard and in portions of the tidal sediment areas. In addition, other contaminants were detected, including polychlorinated biphenyls (PCBs), antimony, copper, arsenic, cadmium, mercury, nickel, and zinc in spot areas above the current NJDEP residential and non-residential soil cleanup standards. Sporadic detections of polyaromatic hydrocarbons (PAHs) and volatile organic compounds (VOCs) were detected in shallow soil samples in some areas.

The U.S. Environmental Protection Agency (EPA) Region 2 conducted additional lead delineation sampling and confirmed the lead levels in the battery casing disposal area. Based on the threat to human health and the environment, EPA has determined that a removal action at this Site is necessary and a fence should be erected to prohibit unrestricted access to this site.

James Matteo and Sons, Inc. is the current owner of the site. Geographic coordinates of the battery casing area are 39° 51' 21.95'' north latitude and 75° 10' 19.32" west longitude. The current site location map is shown on Figure 1.

1.2 PHYSICAL CHARACTERISTICS OF THE SITE

The Matteo Iron & Metal site is located in the Coastal Plain Area of New Jersey. The New Jersey Coastal Plain is a wedge like deposit on unconsolidated sediments of sand, silt, clay, and sand and gravel that extends from the fall line along the Delaware River to the tip of Cape May. These sediments range in age from Cretaceous to Holocene and can be classified as continental, coastal, and marine deposits and are 6,000 feet deep near Cape May. The Cretaceous and

Tertiary age sediments strike from the northeast/southwest and gently dip about 10 to 60 feet per mile. The Quaternary deposits that overlay these sediments are basically lying flat.

The basement rocks are Precambrian and early Paleozoic with Triassic age rocks under the fall line near Trenton.

There are five major aquifer systems in the New Jersey Coastal Plain and these are: 1) the Potomac/Raritan/ Magothy (PRM) system, the Englishtown aquifer, the Wenonah-Mount Laurel aquifer, the Kirkwood Formation, and the Kirkwood-Cohansey aquifer. These units are named from the bedrock in ascending order.

The PMR aquifer is composed of Cretaceous age alternating layers of clay, silt, sand, and gravel and are 4,100 feet thick in Cape May to a thin wedge along the fall line near the Delaware River. Generally, the Merchantville-Woodbury confining unit confines the PMR aquifer and the PMR is generally considered two aquifer units that are the Farrington aquifer and the Old Bridge aquifer. The Merchantville-Woodbury clay is a major confining unit throughout the entire coastal plain and the permeability is very low but the unit can transmit significant quantities of water when the potentiometric heads are significantly different.

Overlying the Merchantville-Woodbury clay unit is the Englishtown sand which is a significant source of water in Monmouth and Ocean counties. Above the Englishtown sands, is the Marshalltown Formation that is a thin (30 feet maximum) unit containing some slightly to moderately permeable beds and act like a leaky confining bed.

The Wenonah-Mount Laurel sands are two distinct units but are hydraulically connected with the Mount Laurel sand a coarser unit than the Wenonah and together these units range for 40 feet thick to 200 feet thick. This combined unit is an important water bearing aquifer in the northern and western parts of the Coastal Plain.

Overlying the Wenonah-Mount Laurel sands is a confining unit made up of several geologic units consisting of the Navesink Formation, Red Bank Sand, Tinton Sand, Hornerstown Sand,

Vincentown Formation, Manasquan Formation, Shark River marl, Piney Point Formation and the basal clay of the Kirkwood Formation. Locally some of these units act as aquifers.

Above these units are the Kirkwood Formation and the Cohansey Sands. These units are hydraulically connected and are a principal water table aquifer for the Pine Barren region and much of South Jersey.

The Delaware River and estuary form the major recharge for the New Jersey Coastal Plain Aquifer and recharge occurs primarily through direct precipitation on these outcrop formations with a smaller component of natural recharge to the deeper layers by vertical leakage from the upper layers.

The aquifer system discharges to the surface through streams, springs and evapotranspiration and these streams flow to the Delaware River watershed or to the Atlantic Ocean. The use of the ground water for water supply present a significant portion of discharge from the aquifer system and heavy pumping in certain areas along the Delaware River results in the river acting as a recharge to the aquifer instead of the aquifer adding base flow to the river.

FIGURE 1

SITE LOCATION MAP

1.3 CURRENT SITE CONDITIONS

The front portion of the site along Crown Point Road is an active metal salvaging facility that accepts scrap metal from individual, commercial, and industrial customers. A small office building and scale are located in this area, and each load is inspected and weighed prior to directing the customer to off-load the scrap at selected drop off points in the yard. Metal is segregated based on the physical metal properties and scrap value at various drop-off points in this yard. Matteo's workers further segregate this scrap material and load the scrap into tractor-trailers for shipment to a regional metal salvage facility. An auxiliary building is located inside the front entrance to the east and is used to accept and segregate higher value, non-ferrous metals (copper, brass, stainless steel). These materials are then placed into drums for aggregation and eventual shipment off-site.

The northern portion of the site, where the elevated soil lead levels and battery casings are evident, is unused and vacant. The area is overgrown with vegetation but has trails present that indicate un-permitted trespass is occurring. These areas are relatively flat, sandy, and well drained with no evidence of ponding.

1.4 OVERVIEW OF REMOVAL ACTION

To prohibit unrestricted access to this site, a chain link fence will be constructed along the entire southern property boundary between the Willow Woods Mobile Home Trailer Park and the Matteo site. This fence will extend from the existing fence along Crown Point Road to the wetlands area bordering Horse Shoe Branch of Hessian Creek and follow the existing property line. In addition, a portion of fence will be erected along the northeastern property boundary tying into an existing fence at the alternative entrance on Crown Point Road near Hessian Run.

The fence will be posted with signs noting that access to the site is restricted (Danger, No Trespassing, Authorized Personnel Only) and placed at 75-foot intervals.

In addition, the scrap metal processing area will be redesigned to minimize access to non-processing areas by the erection of barriers and signage to direct clients to the proper location for off-loading scrap metal. The scrap metal processing areas will also be covered with four (4) inches of recycled crushed aggregate and/or recycled asphalt product. Receiving bins consisting of stacked 6' x 2' x 2.5' concrete blocks will be constructed to segregate various grades of steel, aluminum, cast iron, and mixed light metal.

The details of the work to be conducted as part of this removal action are presented in this Removal Action Plan. The major steps involved to complete the removal construction activities at the Matteo Site are as follows:

- Mobilization
- Site Preparation
- Property Line Survey
- Installation of fence
- Installation of access control to scrap yard
- Installation of scrap metal off-loading areas
- Site Restoration
- Demobilization

A maintenance plan will be developed for the site detailing the implementation of the major steps outlined above once the time-critical actions have been completed. This plan will include the inspections to be conducted, the frequency of inspection, and the means and methods to be employed to insure that the work completed under this AOC are maintained.

1.5 PROJECT ORGANIZATION

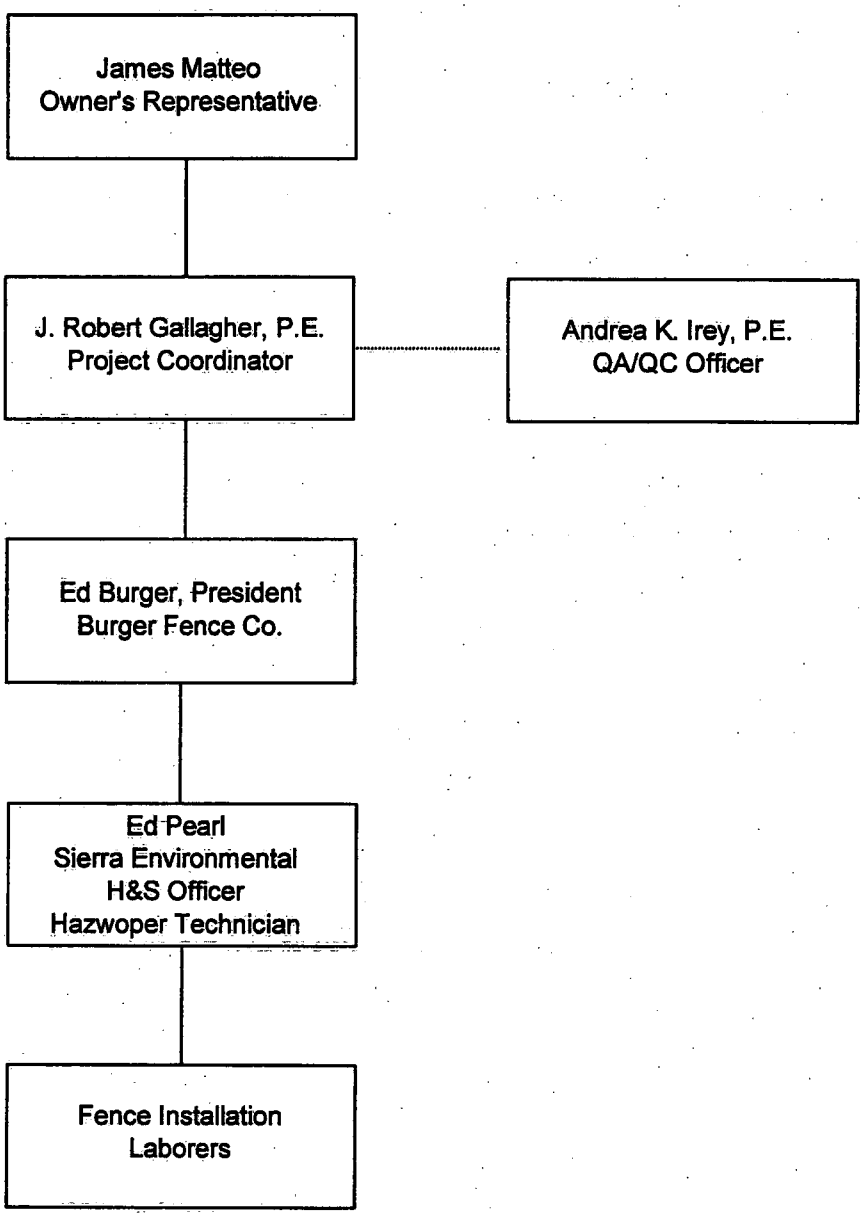
The project organization for the administration, health and safety, quality assurance, and engineering of the remedial action implemented at the Matteo Iron & Metal site is shown in Figure 2. Mr. J. Robert Gallagher, P.E., of Berner Construction, Inc. will serve as the Project

Coordinator for this project. Mr. Gallagher will be responsible for administration of all of the action required by this order and to provide liaison duties with the On-Scene Coordinator, the client, and the contractors.

Figure 2

Project Organization Chart

Matteo Iron & Metal



2.0 MOBILIZATION AND SITE PREPARATION

2.1 MOBILIZATION

2.1.1 Dig Safe

Utility mark-out will be conducted to facilitate protection of existing underground utilities. In accordance with the State of New Jersey regulations, prior to the start of any excavation effort, the fence contractor will identify the locations of all underground utilities and pipelines. The New Jersey One Call notification will be maintained in accordance with the State regulations that mandate that Dig Safe be notified three (3) days prior to any excavation activities, that the construction start within ten (10) days of the notification, and the Dig Safe ticket is valid for forty five (45) days. The contact number for New Jersey One Call Center is (800) 272-1000. All existing utilities will be marked prior to disturbing the ground surface. Lines will be painted on the ground surface and the utility locations will be maintained by the fence contractor throughout the project.

2.1.2 Administrative Construction Office

An administrative office will be temporarily located in the Matteo Iron & Metal office building located at the front entrance of the scrap yard. This office will allow for temporary use of the telephone, copier, and fax machine. Potable water, electrical power, Internet connection, and sanitary facilities will be available at this location.

2.1.3 Laydown/Staging Area

An equipment and material laydown/staging area will be established on the project site. The area will be delineated by the fence contractor at the initial site meeting and will remain throughout the construction process. All material and equipment delivered or demobilized from the project

site will be managed through the laydown Area. This area will be strictly maintained as a clean area. Figure 4 shows the location of the laydown/staging area.

2.1.4 Site Survey and Layout

Prior to the start of the removal effort, a New Jersey licensed surveyor will survey the entire southern property line from Crown Point Road to the wetlands area along the Horse Shoe Branch of Hessian Run and along the northwestern property boundary up to Crown Point Road. The licensed surveyor will establish this property line by providing wooden stakes spaced at fifty-foot intervals (or closer) that will allow the fence contractor to establish and install the fence posts and chain link fence fabric along this property line.

2.1.5 Site Security

The existing Matteo Iron & Metal Site yard is fenced with a six-foot high chain link fence that restricts access to the scrap metal processing areas of the yard. The erection of this new fence will provide restricted access to the eastern, northern, and western areas of the site.

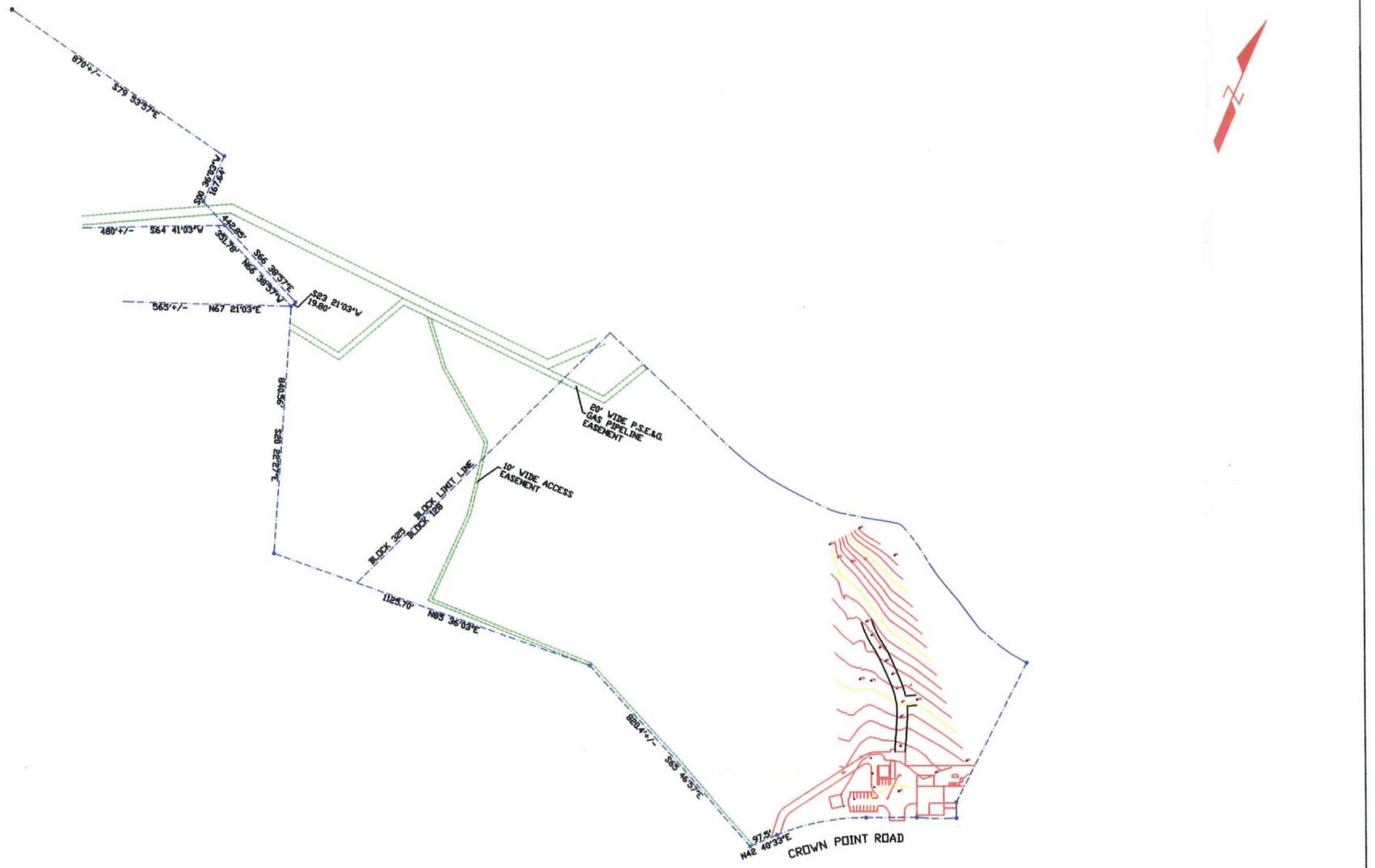
The existing scrap metal yard will have additional restrictions implemented. Barriers and signage will be constructed to direct all off-loading of scrap to specific areas in the scrap yard. The drop off bins on the southern side of the yard will be labeled plate steel, bushling, cast iron, # 2 steel and #1 steel. The bins on the northern side of the yard will be labeled to receive aluminum. The eastern end of the yard will be dedicated to stockpiling light metal. (See Figure No. 4)

The receiving bins will be constructed of concrete blocks that will be stacked to a height of four (4) feet and will be approximately 15 feet wide by 20 feet deep. Every load of scrap metal delivered to the yard is inspected and weighed. The customer delivering these loads will be instructed to the proper bin for the type of material to be deposited and instructed to remain on the paved surfaces and to strictly follow the signage and disposal instructions. The bins will be

color-coded and each customer will be directed to the appropriate color-coded bin. The access roads leading to the scrap metal areas will be covered with four (4) inches of recycled crushed concrete and/or recycled asphalt product and will be clearly delineated with barriers or plastic fencing.

Warning signs (10 inches x 14 inches labeled **Danger, No Trespassing, Authorized Personnel Only**) will be placed on the security fence bordering the Willow Woods Mobile Home Trailer Park and on the existing fenced-in portions of the Matteo Iron & Metal site and spaced at 75-foot intervals.

Additionally, signage will be installed instructing all clients and visitors to the scrap yard to remain on the aggregate paved areas and to only off-load scrap metal in designated areas (Remain on Paved Areas When Off Loading Metal).



BERNER CONSTRUCTION, INC.

FIGURE 3 SITE MAP

MATTEO SCRAP YARD

WEST DEPTFORD TWP., NEW JERSEY

BY: SMG/ADH	J. ROBERT GALLAGHER N. J. LICENSE NO. 32321	Scale:
CHK: J. R. Gallagher		Job No.: ---
Date: 5/11/06		Sht - of

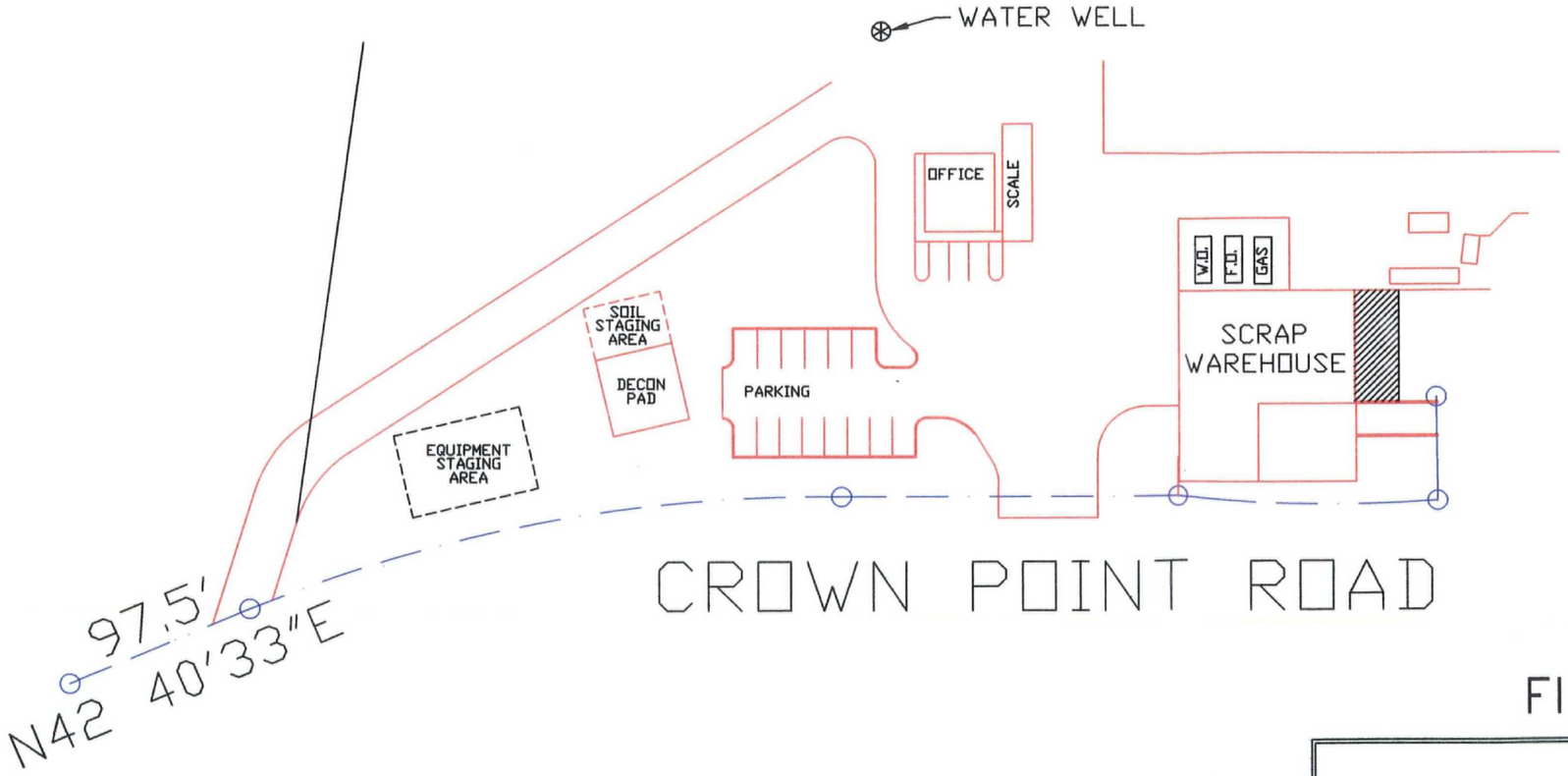


FIGURE 4

BERNER CONSTRUCTION, INC.		
DECON AND STAGING LAYOUT JAMES MATTEO AND SONS THROFARE, NEW JERSEY		
BY: JM/ADH	J. ROBERT GALLAGHER N. J. LICENSE NO. 32321	Scale: N.T.S.
CHK: J.R. Gallagher		Job No.: E600403
Date: 5/11/06		Sht 1 of 1

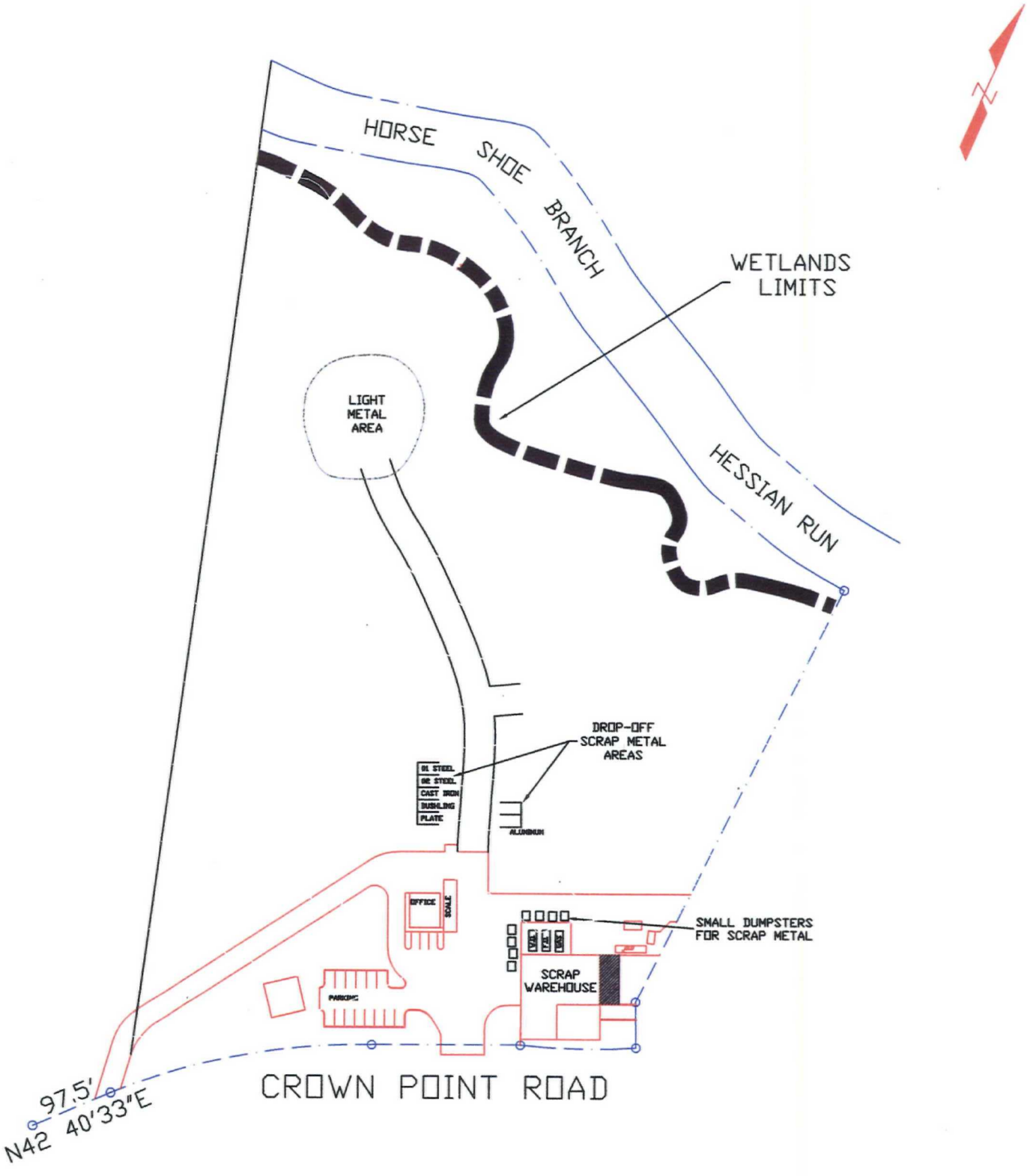


FIGURE 5

BERNER CONSTRUCTION, INC.		
SCRAP METAL OPERATIONS JAMES MATTEO AND SONS THROFARE, NEW JERSEY		
BY: J. MCCULLOUGH		Scale: N.T.S.
CHK: J. MCCULLOUGH	J. ROBERT GALLAGHER N. J. LICENSE NO. 32321	Job No.: 1900401
Date: 4/25/96		Sht. of

2.1.6 Pre-Removal Construction Conference

Prior to the start of the removal action effort, a Preconstruction Conference will be conducted at the project site to familiarize the fence contractor personnel and all subcontractors with the requirements of the project.

A meeting will be conducted at the start of each working day discussing any safety issues, the activities planned for the day, and identifying any problem areas or concerns.

2.2 SITE PREPARATION

2.2.1 Construction Entrance

All access to the site will be through the existing front gate of the Matteo Iron & Metal Site yard and no crossover onto the property of the Willow Woods Mobile Home Trailer Park by construction equipment will be permitted.

2.2.2 Vehicle Decontamination Station

A vehicle decontamination station will be established adjacent to the Soil Roll-Off Staging Area on the existing concrete pad to the south of the existing parking lot (See Figure 3). The vehicle decontamination pad will consist of an existing and bermed concrete pad area. A collection sump will be incorporated into the vehicle decontamination station. Water generated from vehicle and equipment decontamination will be drummed and analyzed for disposal at an approved disposal facility.

The roll off container(s) will be placed next to this pad and these containers will be lined with plastic and made watertight. In addition, the containers will be covered with a tarp to prevent rainwater from entering the containers and to keep dust from blowing out the containers.

2.2.3 Erosion and Sedimentation Controls

No erosion and sedimentation controls measures will be required for this project since the area impacted is less than one acre.

2.2.4 Personnel Decontamination

Personnel working on the project site that may contact contaminated material will be required to go through a decontamination process in accordance with the Site-Specific Health and Safety Plan (HASP). A decontamination station will be established at the vehicle decontamination areas. PPE generated from the decontamination activities will be drummed for transport and off-site disposal. Decontamination/rinse water will be transferred to drums, analyzed, and sent off site for disposal.

2.2.5 Odor and Dust Control Measures

If dusting is encountered during excavation, or other site activities, activities will cease until the area is wetted to control dust generation and or migration. Water will be kept available at each post-hole location during all augering, loading, and removal activities. Water spray devices will be available on-site to minimize fugitive dust. Soil will not be stockpiled on-site and will be transported to a lined roll-off container that is tarped with a weather-proof tarp when not in use to limit dust potential.

Dust monitoring equipment will be used during all soil excavation activities and include measurements for total dust with a DataRam PDR 1000 by NIOSH 7082. Dust levels exceeding 0.05mg/m^3 of total lead will necessitate control measures using clean water to wet the area and eliminate the creation of fugitive dust.

2.2.6 Soil Staging Area

A designated Soil Staging Area will be established for the management of all soil generated during the augering of the post-hole for the fence posts. The holes will be augered by a OSHA (Hazwoper) certified designated person, loaded by hand shovel into a small bobcat-type loader, and transported to the designed roll-off container. The loader will be operated in a safe manner to insure that no excavated material will be spilled in transporting the soil to the roll-off container. In the event this proves difficult, the soils will be placed in closed top drums and transported to the roll-off container for unloading. The wheels and body of the bobcat loader will be inspected between each unloading event to insure that no contaminated soil is tracked to other areas on the site and the wheels and body will be cleaned, as necessary, to prevent tracking of soil.

The augered soil will be loaded into the roll-off container and tested at the completion of all on site-activities to determine the appropriate disposal options. The soil staging area will be maintained in a neat and clean condition.

3.0 REMOVAL ACTIVITIES

3.1 POST-HOLE SOIL EXCAVATION, HANDLING, SEGREGATION AND FENCE INSTALLATION

The initial action at the Matteo site will consist of brush clearing along the property line for purposes of establishing the property line survey. This will be accomplished with brush cutting equipment or a small loader. The trees and brush will only be removed to allow the survey to be completed and the fence installed.

A New Jersey Licensed Professional Land Surveyor will establish the property line along the southern property line of Block 128 and 325- Lot 2 by installing wooden stakes at fifty (50) foot intervals (or closer). This survey line will extend from the existing fence at the corner point in Crown Point Road to the edge of the wetlands along Horse Shoe Branch of Hessian Run and along the northeastern property boundary tying in to an existing fence line at the alternative entrance on Crown Point Road near Hessian Run.

The fence contractor will offset the fence by six (6) inches from the property line and will auger post-holes for the fence posts at ten (10) foot intervals along this line. The holes will be eight (8) inches in diameter by thirty-six inches (36) deep and will be installed with a hand held power auger. The soils generated during this augering will be loaded into the bucket of a small bobcat-type front-end loader and transported to the soil staging area where they will be placed into a lined thirty (30) cubic yard roll-off container. No spillage will be allowed from the loader during this transporting process. A Hazwoper certified technician will perform the soil handling activities including augering, loading, transporting and off-loading the post-hole augered soils.

In the event any off site soil areas are disturbed during the fence installation activities, these areas will be restored by placing topsoil and grass seed to establish new vegetation.

Fence posts (2-½ inch O.D. Schedule 40 pipe) set at ten (10) foot intervals will be centered in each post-hole and anchored by filling the hole with concrete to the ground surface.

Chain link fence fabric (96 inch high/9 gauge/2 inch- galvanized mesh) will be attached to these posts using aluminum tie wire (9 gauge –8 ¼ inch) spaced at 15 inches on center for the line posts and 24 inches on center for the rails.

The fence will be equipped with a top rail (1 5/8 inch O.D. Schedule 40 pipe) that is 21 feet long and joined with 6-inch long sleeves. The fabric will be tensioned with wire (7 gauge coil Class III tension wire) to the bottom of the fabric with 12-½ gauge wire spaced at 24 inches on center. No gaps greater than six (6) inches in depth will be permitted below the bottom of the fence fabric.

Terminal posts will consist of 3 inch O.D. Schedule 40 pipe and placed in holes that are 10 inches in diameter and 36 inches deep.

Signs (10 inches x 14 inches) will be posted on the fence along the entire Matteo Iron & Metal site property line warning that trespassing is prohibited (Danger, No Trespassing, Authorized Personnel Only).

The soils generated from augering the post-holes will be placed in a tarped, roll-off container staged in the soil staging area. At the completion of these activities, a representative composite soil sample will be obtained by a certified OSHA (Hazwoper) trained technician using dedicated stainless steel (or disposable) trowels. Immediately upon collection, the sample will be placed in an iced cooler and transported to an EPA-certified laboratory for RCRA waste classification in accordance with SW 846 procedures and protocols (TCLP Metals by Method 6010, VOCs by Method 8260, SVOCs by Method 8270, PCBs by Method 8082, Cyanide Reactivity by Method 9010, Sulfide Reactivity by Method 9034, and Corrosivity by Method 9045).

Based on the results of the waste classification analysis, the soil generated during the fence installation will be sent to an EPA-approval disposal facility, in full compliance with CERCLA,

as either non-hazardous or hazardous waste. Prior to the off site shipment of any material to an out-of-state waste management facility, written notification will be sent to that state's environmental official responsible for the waste notification and to the EPA-OSC. This notification will include the following information:

- Name and location of receiving facility
- Type and quantity of waste material
- Schedule for shipment
- Method of transportation

A licensed waste hauler, acceptable to EPA, will provide the transportation to an EPA-approved disposal site. The transport vehicle will be provided with shipping documentation consisting of Non-Hazardous or Hazardous Waste Manifests depending on the levels of contamination in the load and the destination disposal facility.

The destination facility will be identified as soon as possible after the execution of the consent order and the contractor will obtain EPA's certification that the proposed facility is in compliance with the requirements of CERCLA Section 121(d), 42 U.S.C § 9621 (d)(3), and 40 C.F.R. §300.440. This notification to EPA will take place at least five (5) days prior to shipment.

4.0 EQUIPMENT DECONTAMINATION

At the conclusion of the fence installation activities, equipment utilized during the excavation and soil load-out operations will be pressure-washed on the concrete pad designed for these purposes at the Soil Roll-Off staging area. Rinsate generated during the decontamination activities will be pumped into drums and disposed of at an approved waste disposal facility in accordance with EPA guidelines based on the waste classification analysis.

Construction equipment will be rinsed at the vehicle decontamination station using pressure washers. Soil generated during the decontamination process will be removed from the decontamination pad and placed into a roll-off container for off-site disposal.

5.0 WASTE TRANSPORTATION AND MANAGEMENT

Loading and transportation of lead-impacted soils will be in compliance with the Federal and State Department of Transportation (DOT) regulations, USEPA and NJDEP Hazardous Waste Regulations, and all local requirements.

As part of the loading and transportation activities, several waste management tasks will be addressed, including the following:

- Prior to shipping any soil/material off-site, confirmation will be obtained that each treatment/disposal facility is properly permitted to accept and handle the given soil/materials.
- The material shipment records/manifests (Land Disposal Restriction Forms) required by the Federal Resource Conservation and Recovery Act (RCRA), the State of New Jersey, and the state where the treatment/recycling/disposal facility is located will be organized and maintained for each load.
- Confirmation will be obtained that waste was delivered only to the facility listed on the shipping manifest. A copy of the manifest signed by the treatment/disposal facility demonstrating acceptance by the facility as well as Certificates of Treatment/Disposal will also be provided.
- Vehicles leaving the loading area will be inspected to ensure that they are properly placarded and tarped.

5.1 SHIPPING DOCUMENTATION

Loading, labeling, placarding, marking, and transporting waste materials will be conducted in accordance with applicable Federal, State, and local regulations. The container/transport truck will be loaded and released from the soil staging area as designated by the fence contractors T&D disposal coordinator.

Prior to loading the wastes, the contractor's designed T&D coordinator will be ensure that the wastes exhibit the characteristics (both physical and analytical) acceptable to the treatment, disposal, and rendering facilities. The contractor will prepare shipping papers for signature by

James Matteo & Sons, Inc. for all wastes leaving the site in accordance with applicable regulations. The contractor will track the shipping papers and will immediately notify James Matteo and Sons, Inc. of any problems in completing the shipment and treatment of wastes. The contractor will provide written evidence in the form of properly completed shipping papers that all waste materials have been properly managed.

The transporter is responsible for transporting waste directly from the site to the appropriate treatment, disposal, or rendering facility. The transporter will also be responsible for the decontamination of truck beds after site waste has been delivered.

The contractor will use only transporters that are licensed by the individual states to haul the appropriate waste category through which the waste will pass.

6.0 PERSONNEL DECONTAMINATION / HEALTH AND SAFETY

A Health and Safety Plan (HASP) has been prepared to ensure the safety of both workers and off-site personnel and is provided under separate cover. A Decontamination Plan for workers and equipment is included in the HASP.

7.0 CONSTRUCTION QA/QC

The following section describes QA/QC procedures to be implemented during the Removal Action to verify the quality of work performed and compliance to the specified requirements, including the inspection of materials and workmanship before, during, and after each task of the project.

7.1 DAILY REPORT

A Construction Site Daily Report (Daily Report) will be completed to document the project activities and is included as Attachment 1. The Daily Report will include the following information:

- Staff on site, including contractor field personnel, subcontractors, and visitors;
- Equipment on site;
- Hours of operation;
- Weather conditions and their impact on construction activities;
- Safety and quality performance issues, if any;
- Safety/environmental program performance;
- Quality program performance, including any non-conformance reports, and corrective action issues;
- Procurement progress, including material and/or equipment delivered to, or leaving the site;
- Cost/schedule performance, including any cost or schedule issues/impacts;
- Contract changes (attach a copy of the Field Change Request (FCR) form, if required);
- Client interface, including details of any communications and/or meetings with client;
- Work performed, noting any issues/impacts and the general progress versus the expected or planned work activities

- A list of material transported off-site and the corresponding manifest numbers and receiving facilities.

The Construction Site Daily Report will be signed by the appropriate personnel. In addition, all Subcontractors may be required to complete a Daily Report for their activities.

7.2 FIELD CHANGE REQUEST

During implementation of the Removal Action, if site conditions necessitate deviations from the proposed property line installation described in this RWP, these deviations will be documented on a Field Change Request (FCR) form that is included as Attachment 2. The FCR will include a description of the requested change, the reason for the change, potential schedule impacts (if any), an order of magnitude cost estimate (if applicable), and signature of a representative of James Matteo and Sons, Inc.

The Project Coordinator will submit a written request to EPA noting the proposed modification and the basis for change. No deviations will be implemented except as outlined in Section XXIV of the AOC.

7.3 INSPECTIONS

An initial inspection will be performed by the Project Coordinator prior to beginning the project. The initial inspection for the applicable features of all work will include, but are not limited to:

- Reviewing contract requirements with the personnel directly responsible for the performance of the work;
- Reviewing the roles and responsibilities of the personnel responsible for the performance, inspection, and acceptance of the work;
- Examining the work area to ascertain that all preliminary work has been completed;
- Verifying all field dimensions;

- Performing a physical examination of materials and equipment to assure that they conform to approved shop drawings or submitted data and that all of the materials, tools and/or equipment are on hand; and
- Identifying the applicable acceptance criteria to those about to perform the work.

Follow-up inspections will be conducted periodically by the Project Coordinator. The inspection will be performed as soon as site personnel have determined that a sufficient portion of the feature of work has been accomplished to evaluate the following criteria:

- Compliance with the specifications, drawings, submittals, and other contract requirements
- Implementation of applicable project procedures
- Use of acceptable materials
- Achievement of acceptable levels of workmanship
- Resolution of differences/difficulties encountered

Follow-up inspections will continue, as necessary. Any deficiencies will be corrected as soon as possible prior to starting the new work or will be identified on the punch list.

7.5 NONCONFORMANCE AND CORRECTIVE ACTIONS

Any work or materials not conforming to the specifications or contract requirements will be identified and documented on a Nonconformance Report (NCR) or other suitable document providing the same information as that included on the NCR form provided as Attachment 3. At a minimum, the NCR will detail the nonconforming condition, recommended corrective action(s), and disposition of the corrective action(s). The NCR will remain open until the nonconforming condition has been satisfactorily resolved and verified by the Project Coordinator.

Documentation of a nonconforming item will, at a minimum, include the following:

- Description of nonconforming item or activity
- Detailed description of nonconformance
- Responsible contractor or subcontractor
- Referenced drawing, specification, or standard criteria
- Recommended disposition
- Acceptance of the disposition by James Matteo and Sons, Inc, as appropriate
- Verification by the Project Coordinator of acceptable completion of the disposition and closure of the NCR

The nonconforming materials or items will be controlled to prevent inadvertent use or further processing. Items given the status of nonconforming will be clearly identified and, whenever practical, segregated from acceptable items.

The disposition of NCRs will include the necessary actions required to bring the nonconforming item to an acceptable condition and may include rejecting, repairing, reworking, replacing, or re-inspecting. Implementation of the disposition may be performed in accordance with the original removal design and procedural requirements, a specific procedure/instruction, or a FCR.

Items determined to be nonconforming during routine in-process inspections or surveillance, and which may be brought into conformance with specified acceptance criteria through rework during the performance of the work, may be reworked without the need to process an NCR. Such items will be noted on the appropriate inspection report and the daily report, documenting the acceptance of the rework.

7.6 RECORDS

Inspection reports/records will be prepared to furnish documentary evidence of the quality of items, services, environmental processes, and engineered systems provided and will include photographic documentation of all site activities.

The Project Coordinator will be responsible for monitoring the control of records and performing scheduled audits or surveillance of the document control system in accordance with the requirements of this procedure.

7.7 Sampling QA/QC

All sampling performed as part of this removal action will follow the guidance of EPA for sampling protocol, quality assurance/quality control (QA/QC), data validation, and chain of control procedures. The laboratory performing the sample analysis shall participate in the QA/QC program of EPA.

The policies and procedures outlined in the Uniform Federal Policy for Implementing Quality Systems (UFP-QS), EPA 505-F-03-001, March 2005; the Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAAP), Parts 1,2, and 3, EPA-505-B-04-900A, B, and C, March 2005 and any other documents referenced in this guidance will be followed.

7.8 INTERIM/FINAL REPORT

Interim progress reports will be submitted every 14th day after the date of the receipt of the approved Removal Work Plan from EPA. These interim reports will describe all significant developments during the preceding period, including all actions performed and any problems encountered, all analytical data, the developments planned for the next reporting period, an updated schedule, and the planned resolution of past or anticipated problems.

A Final Report will be submitted within 30 days of the completion of on site activities.

A Final Report of removal construction activities will be submitted to EPA-II. The Final Report will include the following information:

- A description of construction activities
- Field changes and documentation of approval

- Tabular summaries of soil transported off-site, by destination
- Copies of shipping papers and waste manifests
- Documentation of accident/injury incidents, if any
- Laboratory reports of analyses, including QA/QC data and chain-of-custody documents
- Legible copies of inspection reports generated during the Removal Action
- An estimate of the total costs incurred in completing the work
- An as-built site plan showing final fence location
- Certification signed by the person in responsible charge of the project

The final report will include the maintenance activities planned to address the inspection and maintenance of the chain link fence and all signage and the control measures and plans used to direct customers to the scrap metal processing areas. This plan will include the frequency of inspections, the documentation methods, and the processes for maintaining all controls and restrictions.

Periodic site maintenance reports will be submitted to EPA for one year following EPA written notice of Completion of Work.

ATTACHMENT 1

DAILY REPORT

DAILY REPORT

Project Name:		**Report No.:**	
Client:		**Date:**	
Location:		**Contract No.:**	
Project Coordinator:		**Contract Type:**	
Site Superintendent:			
1 Staff on site:	**Manpower (total on job)**	**Planned**	**Actual**
	Contractor craft:		
	Subcontract craft:		
	Contractor non-manual:		
	Subcontract non-manual:		
2 Equipment on site:			
3 Weather:			
4 ESQ performance:		**This week**	**To-date**
	Recordable cases:		
	Lost time cases:		
	First aid cases:		
	Property damage:		
	Near miss reports:		
	Quality incident reports:		
5 Safety/environmental program performance:			
6 Quality program performance:			
7 Design/engineering support:			
8 Procurement progress:			
9 Cost/schedule performance:			
10 Contract changes:			
11 Client interface:			
12 Work performed:			
13 Work planned:			
Other/comments:			
Report prepared by:		**Date:**	

ATTACHMENT 2

FIELD CHANGE REQUEST FORM

FIELD CHANGE REQUEST FORM

PROJECT:

FCR NUMBER:

PROJECT LOCATION:

DESCRIPTION OF CHANGE:

REASON FOR CHANGE:

RECOMMENDED DISPOSITION:

PROJECT COORDINATOR: _____ _____
Signature Date

MATTEO IRON & METAL: _____ _____
Signature Date

DISTRIBUTION:

Matteo Iron & Metal _____
Contractor Project File _____

ATTACHMENT 3

NONCONFORMANCE REPORT

NONCONFORMANCE REPORT
MATTEO IRON & METAL SITE

NCR #:_____ **Issue Date:**_____ **Closure Date:**_____

Work Element Inspected:_____

Applicable Plans, Drawings, Specifications:_____

Description of Deficient Condition:_____

Project Coordinator Signature:_____ **Date:**_____

Recommended Disposition:_____

Recommender's Signature:_____ **Date:**_____

Actual Disposition:_____

Reinspection Required: _____**Yes** _____**No** **Performed On:**_____

Acceptable: _____**Yes** _____**No**

Closure Signatures:

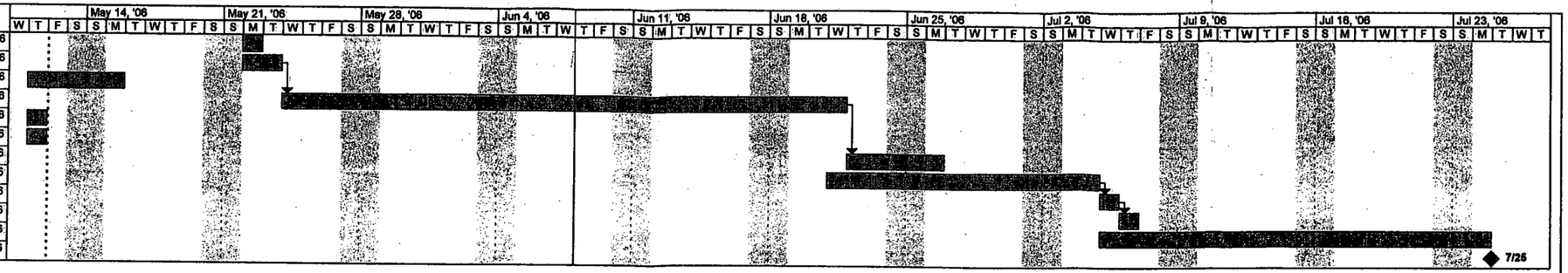
Project Coordinator:_____ **Date:**_____

Matteo Iron & Metal:_____ **Date:**_____

ATTACHMENT 4

PROJECT SCHEDULE

ID	Task Name	Duration	Start
1	Mobilization	1 day?	Mon 5/22/06
2	Site Preparation	2 days	Mon 5/22/06
3	Survey	3 days	Thu 5/11/06
4	Install Fence	21 days?	Wed 5/24/06
5	Install Access Control to Yard	1 day?	Thu 5/11/06
6	Install Drop-off Points in Yard	1 day?	Thu 5/11/06
7	Site Restoration	3 days	Thu 6/22/06
8	Soil Classification	10 days	Wed 6/21/06
9	Transportation and Disposal of Soil	1 day	Wed 7/5/06
10	Demobilization	1 day?	Thu 7/6/06
11	Final report	14 days	Wed 7/5/06
12	Site Maintenance	0 days	Tue 7/25/06



Project: Matteo Iron & Metal
Date: Fri 5/12/06

Task
Split
Progress
Milestone
Summary
Project Summary
External Tasks
External Milestone
Deadline

Project: Matteo Iron & Metal
Date: Fri 5/12/06

Task
Split
Progress
Milestone
Summary
Project Summary
External Tasks
External Milestone
Deadline

156

200

FedEx Express US Airbill

FedEx Tracking Number 8565 7125 6363

Form ID No. 0215

Recipient's Copy

RECIPIENT: PEEL HERE

1 From This portion can be removed for Recipient's records.

Date 5-17-06 FedEx Tracking Number 856571256363

Sender's Name J.R. GALLAGHER Phone 717 442-3110

Company BERNER CONSTRUCTION, INC

Address 1101 QUARRY RD Dept./Floor/Suite/Room

City GAP State PA ZIP 17527-9043

2 Your Internal Billing Reference MATTEO RAP

3 To

Recipient's Name TOM BUDROE Phone

Company USEPA - II - REMOVAL ACTION BRANCH

Recipient's Address 2890 WOODBRIDGE AVE

We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room

Address BLDG. 209

To request a package be held at a specific FedEx location, print FedEx address here.

City EDISON State NJ ZIP 08837

0212267048

8565 7125 6363

4a Express Package Service *Packages up to 150 lbs.*

- [X] FedEx Priority Overnight — Next business morning.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx Standard Overnight — Next business afternoon.* Saturday Delivery NOT available.
- [ ] FedEx First Overnight — Earliest next business morning delivery to select locations.* Saturday Delivery NOT available.
- [ ] FedEx 2Day — Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx Express Saver — Third business day.* Saturday Delivery NOT available.

FedEx Envelope rate not available. Minimum charge: One-pound rate. * To most locations.

4b Express Freight Service *Packages over 150 lbs.*

- [ ] FedEx 1Day Freight* — Next business day.** Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx 2Day Freight — Second business day.** Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx 3Day Freight — Third business day.** Saturday Delivery NOT available.

* Call for Confirmation: ** To most locations.

5 Packaging

- [ ] FedEx Envelope*
- [X] FedEx Pak* — Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.
- [ ] FedEx Box
- [ ] FedEx Tube
- [ ] Other

* Declared value limit $500.

6 Special Handling Include FedEx address in Section 3.

- [ ] SATURDAY Delivery — Not available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 3Day Freight.
- [ ] HOLD Weekday at FedEx Location — Not available for FedEx First Overnight.
- [ ] HOLD Saturday at FedEx Location — Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Does this shipment contain dangerous goods? One box must be checked.

- [X] No
- [ ] Yes — As per attached Shipper's Declaration.
- [ ] Yes — Shipper's Declaration not required.
- [ ] Dry Ice — Dry Ice, 9, UN 1845 ____ x ____ kg

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

- [ ] Cargo Aircraft Only

7 Payment *Bill to:* Enter FedEx Acct. No. or Credit Card No. below. Obtain Recip. Acct. No. [ ]

- [X] Sender — Acct. No. in Section 1 will be billed.
- [ ] Recipient
- [ ] Third Party
- [ ] Credit Card
- [ ] Cash/Check

Total Packages	Total Weight	Total Charges
1	1.25	Credit Card Auth.

†Our liability is limited to $100 unless you declare a higher value. See the current FedEx Service Guide for details.

8 *NEW* Residential Delivery Signature Options If you require a signature, check Direct or Indirect.

- [X] No Signature Required — Package may be left without obtaining a signature for delivery.
- [ ] Direct Signature — Anyone at recipient's address may sign for delivery. *Fee applies.*
- [ ] Indirect Signature — If no one is available at recipient's address, anyone at a neighboring address may sign for delivery. *Fee applies.*

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